

## REMARKS

This is intended as a full and complete response to the Final Office Action dated September 6, 2007, having a shortened statutory period for response set to expire on December 6, 2007. Applicants submit this response to place the application in condition for allowance or in better form for appeal. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1, 5-15, 18-25, 27, 30 and 32-37 are pending in the application. Claims 1, 5-15, 18-25, 27, 30 and 32-37 remain pending following entry of this response.

### Claim Rejections - 35 U.S.C. § 102

Claims 1, 6-15, 18-25, 27, 30, 32-37 are rejected under 35 U.S.C. 102(e) as being anticipated by *Gupta et al.* (U.S. Patent No. 6,956,593, hereinafter, "Gupta").

Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

With respect to claim 1, Applicants submit that *Gupta* does not teach "providing a set of annotation structures, each associated with one or more of the annotatable data objects and each defining attributes of one or more user interfaces for manipulating annotations for the annotatable data objects, wherein the one or more user interfaces comprise at least one graphical user interface, based on an associated annotation structure; and providing one or more transforms for use in transforming annotations structures into graphical user interfaces," as recited in this claim.

In rejecting this claim, the Examiner relies on Col. 7 lines 27-30, Col. 9 lines 15-25, Col. 12 line 55 to Col. 13 line 32 and Figs. 7-11 of *Gupta* for this teaching, *Final Office Action*, p.2-3.

"providing a set of annotation structures, each associated with one or more of the annotatable data objects and each defining attributes of one or more user interfaces for manipulating annotations for the annotatable data objects" at Col. 7 lines 27-30, Col. 9 lines 15-25, Col. 12 line 55 to Col. 13 line 32 and Figs. 7-11;

"wherein the one or more user interfaces comprises at least one graphical user interface, based on an associated annotation structure" at Figs. 7-11.

"providing one or more transforms for use in transforming annotations structure into graphic user interface" Col. 12 line 55 to Col. 13 line 32 and Figs. 7-11.

Applicants respectfully disagree. Col. 7 lines 27-30 of *Gupta* describe an exemplary structure for an annotation entry. Col. 9 lines 15-25 further explain a Set Identifier on that exemplary structure, and state many-to-many relationships between media contents and annotation sets. Col. 12 line 55 to Col. 13 line 32 talk about an exemplary "add new annotation" dialog box in details. And Figs 7-11 are a set of exemplary "add new annotation" dialog boxes.

These cited passages plainly do not teach "providing a set of annotation structures, each associated with one or more of the annotatable data objects and each defining attributes of one or more user interfaces for manipulating annotations for the annotatable data objects." Figs. 7-11 do list a set of "add new annotation" dialog boxes, but there is no mention of "one or more user interfaces comprises at least one graphical user interface, based on an associated annotation structure." Finally, Col. 12 line 55 to Col. 13 line 32 and Figs. 7-11 certainly do not teach "providing one or more transforms for use in transforming annotations structure into graphic user interface."

In response to Applicants' arguments, the Examiner states in *Final Office Action*, P.9:

On the contrary, *Gupta* teaches at Fig. 3 a set of annotation structure 17, 18 in **SQL relational format** (See Col. 7 lines 5-10) are **transformed to HTML** to be rendered and displayed to the user to the browser 153.

Applicants respectfully disagree. In fact, there is no mention of this transformation of annotation structure to HTML in *Gupta*. Col. 7 lines 5-10 state: "The annotation content and meta data can be stored in any of a variety of conventional manners, such as in SQL relational databases." However, *Gupta* does not mention how the data stored in relational database get to the web page. For those skilled in the art know there are lots of ways to accomplish this, most commonly is through java server page (JSP) or active server page(ASP), it's not necessary to transform data in SQL relational format to HTML. Therefore, *Gupta* does not teach "providing one or more transforms for use in transforming annotations structure into graphic user interface."

Accordingly, Applicants submit claim 1 and its dependents are allowable and respectfully request withdrawal of this rejection.

With respect to claim 15, Applicants submit that *Gupta* does not teach "retrieving one or more annotation structures associated with a data object and dependent, at least in part, on at least one credential of a user initiating the request, wherein the at least one credential comprises a role of the user" and "generating a graphical user interface based on one of the annotation structures."

The Examiner argues that *Gupta* teaches retrieving one or more annotation structures associated with the data object and dependent on a role of the user, and generating a graphical user interface based on one of the annotation structures at Col. 12 line 55 to Col. 33 line 32. Applicants respectfully disagree. Applicants submit, the referred passages of *Gupta* describe that in a "Create New Annotation" dialog box, the user can select an annotation set identifier, which the new annotation will belong, from either a predefined set or a new set created by the user. *Gupta*, Col. 12 lines 60-66. In contrast, the current application involves retrieving one or more annotation structures associated with a data object and generating a graphical user interface based on one of

the annotation structures. In other words, the “create new annotation” graphical user interface is generated based on the retrieved annotation structure. Certainly nowhere in the cited passages or any other portion of *Gupta* is retrieving one or more annotation structures associated with a data object and generating a graphical user interface based on one of the annotation structures.

Therefore, claim 15 and its dependents are believed to be allowable, and withdrawal of this rejection is respectfully requested. Claim 25 has similar limitations, by the same reason stated above, claim 25 and its dependents are believed to be allowable, and withdrawal of this rejection is respectfully requested.

With respect to claim 30, Applicants submit that *Gupta* does not teach “a set of application plug-ins, each specific to one or more of the applications and configured to communicate with the annotation server via the application programming interface functions”, as recited in this claim.

In rejecting that claim, the Examiner makes a conclusory statement that this claim contains similar limitations to other claims that were rejected based on *Gupta*. In his response to Applicants’ previous arguments, the Examiner states that:

as seen in Fig. 3, *Gupta* teaches the MAWS 130, which is a plug-in for the IIS module 135, that provides an interface between requesting application(i.e., Web Browser 153) and the executable component for managing annotation(i.e., ABE 132). Further, the user interface 152 could also be consider “a plug-in component” for the web browser 153, which sends a request to annotation server 10 and provides an interface between the requesting application(i.e., browser 153) and the executable component for managing annotation(i.e., “annotation server 10). *Final Office Action*, p.10.

Applicants respectfully disagree on this finding. MAWS 130 in Fig. 3 of *Gupta* is part of the annotation server 10. See also Col. 6 lines 52-63.

However, claim 30 clearly states that a set of application plug-ins configured to communicate with the annotation server via the application programming interface functions (API), the application plug-ins are certainly not part of the annotation server. The Examiner then argues that the user interface 152 could be considered as “a plug-in component.” Applicants submit that the application plug-in is configured to communicate with the annotation server via API, the user interface 152 in Fig. 3 of *Gupta* talks to ABE 151, which translates user actions into commands destined for server 10, then through HTTP services module 150, which manages communication with server 10. *Gupta*, Col. 6 lines 29-33. Plainly, the user interface 152 does not directly communicate with the annotation server 10 via API, but through ABE and HTTP services module. Therefore, the cited section of *Gupta* is not the application plug-in component as claimed. Since this is only place in *Gupta* mentioning plug-in, therefore, *Gupta* does not teach “a set of application plug-ins, each specific to one or more of the applications and configured to communicate with the annotation server via the application programming interface functions,” as recited in this claim.

Accordingly, Applicants submit claims 30, as well as its dependents are allowable and respectfully request withdrawal of this rejection.

For the foregoing reasons, Applicants respectfully submit that *Gupta* does not teach “each and every element” of the cited claims. Therefore, the claims are believed to be allowable, and allowance of the claims is respectfully requested.

Claim Rejections - 35 U.S.C. § 103

Claim 5 is rejected under 35 U.S.C. 103(a) as being unpatentable over *Gupta* as applied to claims above, and in view of *Kadel et al.* (U.S. Publication 2002/0184401, hereinafter, “*Kadel*”). Claim 5 is dependent off of claim 1, which Applicants submit is allowable for reasons discussed above. Accordingly, Applicants submit this claim is also allowable and respectfully request withdrawal of this rejection.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

If the Examiner believes any issues remain that prevent this application from going to issue, the Examiner is strongly encouraged to contact Randol W. Read, Applicants' representative, at (336) 643-3065, to discuss strategies for moving prosecution forward toward allowance.

Respectfully submitted, and  
**S-signed pursuant to 37 CFR 1.4,**

/Randol W. Read, Reg. No. 43,876/

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